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6 UNITED STATES DISTRICT COURT FOR THE
7 WESTERN DISTRICT OF WASHINGTON
8 AT SEATTLE/TACOMA

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10 ASHLEY M. FLINT,

11 Plaintiff,

12 v.

13 UNITED STATES OF AMERICA,

14 Defendant.
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CASE NO. 2:18-cv-01359-RSM

STIPULATED MOTION TO
EXTEND ANSWER AND INITIAL
SCHEDULING DEADLINES
AND ORDER

17 **JOINT STIPULATION**

18 COMES NOW the Plaintiff, Ashley M. Flint, through her attorney, Cornelia
19 Clark, and Defendant, the United States of America, through its counsel, Tricia Boerger,
20 Assistant United States Attorney, in this stipulated motion to extend the initial scheduling
21 dates in this matter as follows:

22 Answer	12/07/2018
23 Deadline for FRCP 26(f) Conference:	12/20/2018
24 Initial Disclosures Pursuant to FRCP 26(a)(1):	01/03/2019
25 Combined Joint Status Report and Discovery 26 Plan as Required by FRCP 26(f) and Local 27 Civil Rule 26(f):	01/10/2019

1 This extension is necessary because the United States has not had adequate time to
2 confer with the federal agency or understand the facts or nature of the case sufficient to
3 answer the complaint, participate in a discovery conference, submit initial disclosures or
4 prepare a discovery plan. The United States' answer is due on November 23, 2018. As
5 such, the parties are requesting an extension of time for filing an answer and initial
6 scheduling deadlines to allow time to review the initial pleadings and participate
7 meaningfully in the FRCP 26 process.

8 The parties though their counsel further agree that neither party will be prejudiced
9 by this agreement.

10 DATED this 9th day of November, 2018.

11 Respectfully submitted,

12 ANNETTE L. HAYES

13 United States Attorney
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15 s/ Cornelia Clark

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s/ Tricia Boerger

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Attorneys for Defendant

1 **ORDER**

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3 The Court, having reviewed the parties' stipulated motion and the record in this

4 matter and being fully informed, finds good cause exists to extend the initial scheduling

5 dates as requested. As such, and the parties having so stipulated and agreed, it is hereby

6 **ORDERED** that the initial scheduling dates shall be extended as follows:

7 Answer: 12/07/2018

8 Deadline for FRCP 26(f) Conference: 12/20/2018

9 Initial Disclosures Pursuant to FRCP 26(a)(1): 01/03/2019

10 Combined Joint Status Report and Discovery

11 Plan as Required by FRCP 26(f) and Local

12 Civil Rule 26(f): 01/10/2019

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14 DATED this 14 day of November 2018.

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16 RICARDO S. MARTINEZ

17 CHIEF UNITED STATES DISTRICT JUDGE

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